

1 SAMUEL R. MAIZEL (Bar No. 189301)  
2 samuel.maizel@dentons.com  
3 TANIA M. MOYRON (Bar No. 235736)  
4 tania.moyron@dentons.com  
5 AHMED (“ANDY”) R. JINNAH (Bar No. 297907)  
6 andy.jinnah@dentons.com  
7 DENTONS US LLP  
8 601 South Figueroa Street, Suite 2500  
9 Los Angeles, California. 90017-5704  
10 Telephone: (213) 623-9300  
11 Facsimile: (213) 623-9224

12 ANDREW T. SOLOMON (*admitted pro hac vice*)  
13 asolomon@soloconramer.com  
14 SOLOMON & CRAMER LLP  
15 1441 Broadway, Suite 6026  
16 New York, New York 10018  
17 Telephone: (212) 884-9102  
18 Facsimile: (516) 368-3896

19 Attorneys for Plaintiff Matthew Pliskin,  
20 as Trustee of the ICPW Nevada Trust

21 **UNITED STATES DISTRICT COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA (WESTERN DIVISION)**

23 MATTHEW PLISKIN, AS TRUSTEE OF THE  
24 ICPW NEVADA TRUST

25 Plaintiff,  
26 -against-

27 ROBERT GOLDSTEIN and DRG STRATEGIC,  
28 LLC d/b/a MERIDIAN GLOBAL,

Defendants.

Case. No.: 2:18-cv-09491-FMO(ASx)

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE THAN  
30 DAYS (L.R. 8-3)**

Complaint served: November 26, 2018  
Current response date: December 17, 2018  
New response date: January 16, 2019

25 WHEREAS, Plaintiff Matthew Pliskin, solely in his capacity as Trustee for the ICPW Nevada  
26 Trust, filed Case No. 2:18-cv-09491-FMO(ASx) against Defendants Robert Goldstein and DRG  
27 Strategic, LLC, on November 8, 2018;

1        WHEREAS, Plaintiff served his Summons and Complaint on Defendants on November 26,  
2 2018;

3        WHEREAS, pursuant to F.R.C.P. 12(a), Defendants were required to serve a response to the  
4 Complaint on or before December 17, 2018;

5        WHEREAS, there have been no previous agreements or requests submitted to the Court  
6 regarding an extension of time in this matter;

7        WHEREAS, Defendants previously communicated to Plaintiff that they were not represented  
8 by counsel and that they required additional time to retain an attorney and respond to the Summons  
9 and Complaint;

10      WHEREAS, Defendants have requested, and Plaintiff has agreed, pursuant to L.R. 8-3, to an  
11 extension of 30 days beyond December 17, 2018 for Defendants to respond to the Complaint.

12      NOW, THEREFORE, by and through their respective counsel, Plaintiff and Defendants  
13 stipulate and agree that Defendants' response to Plaintiff's Complaint shall be due on or before  
14 January 16, 2019. Defendants further stipulate and agree not to contest service of process, but  
15 otherwise reserve all rights and defenses, including the right to contest personal jurisdiction and  
16 venue.

17  
18 Dated: January 11, 2019

DENTONS US LLP

By: /s/ Ahmed ("Andy") R. Jinnah  
Samuel R. Maizel  
Tania M. Moyron  
Ahmed ("Andy") R. Jinnah

SOLOMON & CRAMER LLP

By: /s/ Andrew T. Solomon  
Andrew T. Solomon (*admitted pro hac vice*)

Attorneys for Plaintiff Matthew Pliskin, as  
Trustee for the ICPW Nevada Trust

1 Dated: January 11, 2019

LTL ATTORNEYS LLP

2 By: /s/ Joe H. Tuffaha

3 Joe H. Tuffaha

4 (Bar No. 253723)

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